

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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|------------------|-----------------------|
| <b>IN RE:</b>    | :                     |
| Elizabeth Miller | :                     |
|                  | Chapter 13            |
|                  | Case No. 22-11747-MDC |
| <b>Debtor(s)</b> | :                     |

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**RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY  
FILED BY M&T BANK**

Debtor, Elizabeth Miller, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by M&T Bank, hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted payments were missed. Debtor asks for the chance to cure the post-petition arrears.
7. Debtor opposes the same.
8. Admitted payments were missed. Debtor recently returned to work and asks for the chance to cure the post-petition arrears
9. Denied.
10. No opposition to potential offers to assist Debtor.
11. No response required.

WHEREFORE, Debtor, by and through the undersigned counsel, respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

/s/ Brad J. Sadek, Esq.

Dated: October 20, 2022

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Brad J. Sadek, Esq.  
Attorney for the Debtor  
Sadek & Cooper  
1500 JFK Boulevard Suite #220  
Philadelphia, PA 19102  
(215) 545-0008

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**CERTIFICATE OF SERVICE**

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

**Kenneth E. West, Esq.**  
Standing Chapter 13 Trustee  
Electronic Notice

**Denise Carlon, Esq.**  
Attorney for Movant *M&T Bank*  
Electronic Notice to *dcarlon@kmllawgroup.com*

Dated: October 20, 2022

/s/Brad J. Sadek, Esq.

Brad J. Sadek, Esq.  
Attorney for Debtor